

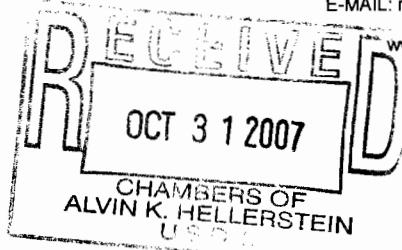
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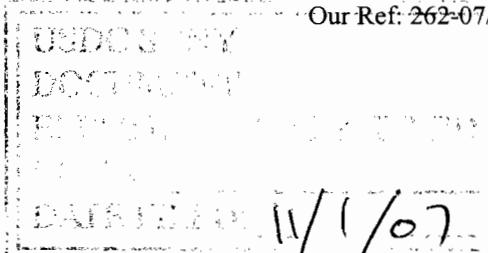


October 30, 2007

*Received  
10-31-07  
Dkt. filed*

**BY HAND**

The Honorable Alvin K. Hellerstein  
 Daniel Patrick Moynihan U.S. Courthouse  
 5000 Pearl Street, Room 1050  
 New York, New York 10007



Our Ref: 262-07/PJG/MAM

Re: Trader Special Maritime Enterprises v. Calder Sea Carrier Corp.  
07-5809 (AKH)

Dear Judge Hellerstein:

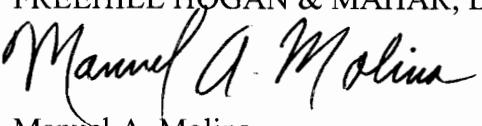
We represent the Plaintiff Trader Special Maritime Enterprises in connection with the above-referenced Rule B maritime attachment action. We respectfully request that Plaintiff be granted a 60-day extension to serve the Summons and Complaint upon Defendant Calder Sea Carrier Corp. ("Calder"). This is Plaintiff's first request.

By way of background, on June 20, 2007, Plaintiff filed an Amended Verified Complaint against Calder seeking security, in the sum of \$1,359,04.15 for its various maritime claims via an attachment of Calder's property in this District pursuant to Rule B. (Copy attached). Your Honor had rejected Plaintiff's earlier application on the basis that the Verified Complaint did not specifically describe the items of damages being claimed by Plaintiff. Based on the allegations contained in the Amended Complaint, the Court issued an Order of Attachment. (Copy attached). To date, Plaintiff has not been successful in restraining any of Calder's assets, although it continues its efforts to do so by effecting daily service of the Process of Maritime Attachment and Garnishment upon various New York banks. We note that Local Admiralty Rule B.2 recognizes the importance of keeping Rule B actions *ex parte* until property is actually restrained, and provides that notice of attachment is not required to be given to the Defendant until after its property has been restrained. We respectfully submit that service of the Summons and Complaint at this time would defeat the purposes of Rule B.

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In light of the foregoing considerations, we therefore respectfully request that Your Honor grant the within application and extend Plaintiff's time to effect service of process to December 30, 2007.

We thank the Court for its attention to this matter.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR, LLP  
  
Manuel A. Molina